DOCUMENT RESUME

ED 192 009 CE 026 212

AUTHOR	Wasdyke, Raymond G.; And Others
TITLE	Providing Students in Nonprofit Private Schools with Access to Publicly Supported Vocational Education Programs. Final Report.
INSTITUTION	Educational Testing Service, Princeton, N.J.
SPONS AGENCY	Bureau of Occupational and Adult Education (DHEW/OE), Washington, D.C.
BUREAU NO	498AH80047
PUB DATE	Apr 80
CONTRACT	300-78-0595
NOTE	91p.
EDRS PRICE	MF01/PC04 Plus Postage.
DESCRIPTORS	*Access to Education; *Change Strategies; *Cooperative Programs; Definitions; Educational Cooperation; Educational Finance; Educational Legislation; *Federal Legislation; Institutional Cooperation; *Private Schools; Program Implementation; Public Education; Statistics; *Vocational Education
IDENTIFIERS	*Vocational Education Amendments 1976

ABSTRACT

A project was conducted to increase participation of students enrolled in nonprofit private schools in vocational programs funded under the Vocational Education Amendments of 1976 (P.L. 94-482). Objectives were (1) to identify factors facilitating private student access to vocational programs, (2) to develop and field test implementation procedures for state and local agencies, and (3) to disseminate this information to state and local vocational program administrators. Practices used to implement P.L. 94-482 were identified through field studies in nine states, classified, and used in developing a videotape presentation which was disseminated along with related materials during workshops for state and local education agency staff responsible for implementing the amendments. Research revealed that cooperative relations between private and public institutions are impeded by structural, philosophical, attitudinal, communication, and administrative barriers including the absence of accurate data bases, poor communications network among private and public institutions, state policies discouraging joint public and private programs, and traditional antipathy between public and private school administrators. Recommendations for improving private school student access to vocational programs include expanding provisions of the law to include all federally funded vocational programs, joint planning at all government levels, and development and dissemination of information about model cooperative programs. (MN)

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ED192009

Final Report

Application Number: 498AH80047
Contract Number: 300780595

PROVIDING STUDENTS IN NONPROFIT PRIVATE SCHOOLS WITH ACCESS TO PUBLICLY SUPPORTED VOCATIONAL EDUCATION PROGRAMS

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April 1980

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CE 026 212

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Office of Education

Bureau of Occupational and Adult Education

ABSTRACT

CONTRACT: #300780595

PROJECT TITLE: PROVIDING STUDENTS IN NONPROFIT PRIVATE SCHOOLS WITH ACCESS TO PUBLICLY SUPPORTED VOCATIONAL EDUCATION PROGRAMS

PRINCIPAL INVESTIGATOR: RAYMOND G. WASDYKE
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PURPOSE:

The broad goal of the project was to increase the participation of students enrolled in nonprofit private schools in vocational programs funded under the Vocational Education Amendments of 1976. Specific objectives of the project were: (1) identifying significant factors that facilitate access to vocational education programs by nonprofit private students; (2) developing and field testing procedures that State Education Agencies (SEAs) and Local Education Agencies (LEAs) can implement to assure these students access to vocational programs; and (3) disseminating this information and related materials to individuals at the state and local levels involved in the administration of vocational education programs.

PROCEDURES:

Field studies were conducted in New York, New Jersey, Ohio, Illinois, Wisconsin, Georgia, Texas, Pennsylvania, and California to identify practices used to implement access requirements of P.L. 94-482 regarding nonprofit private students. Practices that facilitated access were classified and used in the development of a 20-minute videotape presentation, a Procedural Guide, and related materials that described the salient issues and problems related to private students' involvement in vocational education programs. Suggested activities for establishing cooperative relations between private and public institutions were also included in the materials. The videotape and related materials were disseminated during four three-day workshops for SEA and LEA staff who maintain responsibility for implementing P.L. 94-482 provisions regarding accessibility of private school students to public vocational education programs.

FINDINGS AND CONCLUSIONS:

The development of cooperative relations between private and public institutions is impeded by a wide variety of structural, philosophical, attitudinal, communication, and administrative barriers. Among those barriers are the absence of accurate data bases, poorly developed communication networks among private institutions and between private and public institutions, state policies that discourage joint public and private programs, and traditional antipathy between public and private school administrators.

RECOMMENDATIONS:

Recommendations for improving the access of private school students to vocational programs include expanding the provisions of P.L. 94-482 to provide these students with access to all federally funded vocational programs, joint private and public planning at all governmental levels, and the development and dissemination of information about model cooperative programs conducted by private and public institutions.

TABLE OF CONTENTS

Abstract iv

Preface. v

CHAPTER I. INTRODUCTION 1

Background. 1
Project Purpose 4
Report Organization 5

CHAPTER II. METHODOLOGY 6

Content Development 6
Materials Development 7
Dissemination 9

CHAPTER III. STATE OF THE ART OF NONPROFIT PRIVATE SCHOOL STUDENTS' PARTICIPATION IN PUBLICLY SUPPORTED VOCATIONAL EDUCATION PROGRAMS. . . 11

Introduction. 11
Nonprofit Private Schools: An Overview 12
Private Schools and Federal Vocational Education: Legislative Background 18
Review of Literature and Federal Data 26
Barriers to Participation of Private Schools in Public Vocational Education Programs 31
Summary and Conclusions 36

CHAPTER IV. BARRIERS TO THE PARTICIPATION OF NONPROFIT PRIVATE SCHOOL STUDENTS IN FEDERALLY SUPPORTED VOCATIONAL EDUCATION PROGRAMS . . . 38

Introduction. 38
Philosophical and Attitudinal Barriers. 39
Communication Barriers. 41
Structural Administrative Barriers. 44
Summary and Conclusions 49

CHAPTER V. COPING WITH THE BARRIERS 51

Introduction 51
Philosophical and Attitudinal Barriers. 51
Communication Barriers. 54
Financial Barriers. 56
Administrative and Structural Barriers. 57
Summary and Conclusions 58

TABLE OF CONTENTS (cont.)

CHAPTER VI. FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS. . 59

Introduction. 59
Findings and Conclusions. 59
Recommendations 66

BIBLIOGRAPHY 70

APPENDIX A. ADVISORY COMMITTEE MEMBERS. 72
APPENDIX B. RULES AND REGULATIONS FOR VOCATIONAL EDUCATION LEGISLATION THAT RELATE TO NONPROFIT PRIVATE SCHOOL STUDENTS 73
APPENDIX C. REGIONAL WORKSHOP PARTICIPANTS. 78

PREFACE

When this study was undertaken, there was relatively little concern among private and public school officials about the vocational education needs of nonprofit private school students. During the short span of a year, however, the attention focused on this topic has brought about some modest changes. There is now greater interest in providing nonprofit private school students with opportunities for public vocational education as a corollary to their schooling in the private sector.

It is hoped that this report will provide a broader perspective on the issues and problems likely to be encountered in providing private school students with vocational opportunities in federally supported vocational education programs.

Many people have assisted in the conduct of this project. The members of the project's Advisory Committee, who provided continuing encouragement, guidance, and support throughout this project, deserve special mention. The committee members included Sister Caroleen Hensgen, Alton D. Ice, Robert L. Lamborn, the Reverend Lawrence M. Deno, Joseph P. McElligott, Richard Murr, and Robert D. Wolf.[1] The project staff is also indebted to the Council for American Private Education (CAPE) for its generous assistance and support.

The project staff would also like to thank all the state and local private and public representatives who patiently provided us with information about cooperative undertakings between private and public educational institutions. We are especially grateful to representatives

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[1]Appendix A includes the titles and addresses of the project's Advisory Committee.

in the states that were the primary source of field data: California, Georgia, Illinois, New Jersey, New York, Ohio, Pennsylvania, Texas, and Wisconsin.

Appreciation is also extended to Richard DiCola, Project Officer, and Marion Craft, Director of Cooperative Vocational Education Programs, U.S. Office of Education, Bureau of Occupational and Adult Education, for their generous assistance during the course of the project.

Numerous Educational Testing Service (ETS) staff were actively engaged in the project. George Elford and Terry Hartle collected field data, assisted in conducting regional workshops, and made significant contributions toward preparation of this report. The following ETS staff also collected field data and conducted workshops: Arleen Barron, Reginald Corder, Angela D'Aversa, Diana Glad, Robert Lambert, Charlotte Rentz, Ronald Rodgers, and Ivor Thomas. Robert Purdy was responsible for the production of the videotape.

CHAPTER I. INTRODUCTION

Background

Although students enrolled in nonprofit private institutions[1] have the same employment needs as their counterparts in the public education sector, traditionally they have not had comparable opportunities to prepare for employment. A broad array of structural, attitudinal, and fiscal problems, among other barriers, have effectively worked against the involvement of private school students in publicly financed vocational education programs.

Congress first officially recognized the importance of providing all students with relevant preparation for employment through its 1968 amendments to the Vocational Education Act of 1963, and through a subsequent revision of those amendments by passage of the Education Amendments of 1976 (Public Law 94-482). Title I--Vocational Education, Part A, Subpart 2, Basic Grant, provides that funds available to the states under Section 120 for cooperative vocational education programs "... may be used for establishing or expanding cooperative vocational education programs through local education agencies with the participation of public and private employers. Such programs shall include provisions assuring that ...to the extent consistent with the number of students enrolled in nonprofit private schools in the area to be served, whose educational needs are of the type which the program or project involved is to meet, provision has been made for the participation of such students."

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[1] As used in this report, the phrase "private school students" means nonprofit private school students only.

Subpart 3, Program Improvement and Supportive Services, Section 132 (b), Exemplary and Innovative Programs, and Subpart 4, Special Programs for the Disadvantaged, Section 140(b), contain comparable provisions for the participation of private school students.

The Vocational Education Amendments of 1968 also contained provisions related to the participation of private school students in federally funded vocational education programs. However, in preparing the most recent legislation, the House of Representatives was critical of vocational educators' disregard for these provisions.[1]

The Vocational Education Amendments of 1976 and the accompanying rules and regulations include quite specific and carefully delineated provisions.[2] Basically, these regulations require that public school vocational education staff first identify students enrolled in private schools who may have educational needs similar to their public school counterparts. After assessing the needs of these private school students in relation to the federally funded vocational education programs, public school vocational education administrators should provide these students with genuine opportunities to take part in these programs, which are designed to serve youth in both public and private schools.

The legislative underpinnings that guarantee federal assistance to private school students began with the passage of the Elementary

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[1]U.S. House of Representatives, The Vocational Education and National Institute of Education Amendments of 1976, Report No. 94-1085, 1976, p. 46.

[2]The full text of both the legislation and the rules and regulations dealing with public and private school cooperation are included in Appendix B of this report.

and Secondary Education Act (ESEA) in 1965. Subsequently, provisions for assisting private school students were added to the Vocational Education Amendments of 1968, the Bilingual Education Act (1974), the Education of All Handicapped Children Act (1974), the Education Amendments of 1978, Title I of ESEA, and the Career Education Act of 1978.

The available evidence suggests that private school students are not adequately served; the requirements of the Vocational Education Amendments of 1976 have not been met. It appears on the strength of the evidence to date that little real progress has been made since provisions for private school students' involvement in federally supported programs were included in the Vocational Education Amendments of 1968.

Although some states have taken pioneering steps to ensure full implementation of the legislative provisions, they are few in number. Interestingly, in some state departments of education where attitudes are nonsupportive or even antagonistic toward private school students, local vocational administrators have provided the leadership to work out cooperative arrangements with private institutions.

In most states, however, legislative guarantees of federal assistance have not been transformed into equitable educational opportunities for private school students. The crux of the issue is control over access. The state or local educational agency responsible for implementing the legislation--in this case the Vocational Education Amendments of 1976--in large measure controls the access of private school students to vocational education programs.

Of the obstacles standing in the way of cooperation between private and public institutions, the most prevalent and persistent seem to be attitudinal and communications problems. Misperceptions, negative stereotypes, and distrust are shared by private and public educators alike.

Without exception, positive interaction between these two educational sectors relied heavily on previously existing personal friendships. Furthermore, where successful cooperative programs exist, they were initiated and implemented on the basis of a commonly held view of the importance of serving the vocational needs of all our nation's youth regardless of whether they are enrolled in private or public institutions.

In summary, the Vocational Education Amendments of 1976 have created the context in which the vocational needs of private schools students can be met. However, the decision as to whether state and local education agencies will operate within this context has, for the most part, been made by the agencies themselves.

Project Purpose

The broad goal of this project was to increase the participation of students enrolled in private schools in vocational education programs funded under the Vocational Education Amendments of 1976. The plan for achieving this goal included the development, and dissemination of information about, procedures that can be used by State Education Agencies (SEAs) and Local Education Agencies (LEAs) to assure that private school students have access to vocational education programs.

The specific purpose of the project was to increase these students' participation in publicly supported vocational education programs by (1) identifying significant factors that facilitate access to vocational education programs by private school students, (2) developing and field testing procedures that SEAs and LEAs can implement to assure such access, and (3) disseminating this information and associated published materials to a wide audience of persons at the state level involved in the administration of vocational education programs.

Report Organization

The remaining chapters of this report include a description of the methods employed in the project, a review and analysis of relevant literature and data bases, identification of the barriers that restrict access, a description of procedures that can be used to implement cooperative arrangements, and the project's findings, conclusions, and recommendations.

CHAPTER II. METHODOLOGY

Project activities were clustered into three related tasks:

- Content Development
- Materials Development
- Dissemination of Information

Content development involved identifying and classifying current practices regarding the accessibility of public vocational education programs to private school students and developing procedures for increasing the accessibility of these programs. Materials development involved preparing and field testing a videotape presentation, Procedural Guide, and supporting documents describing procedures SEAs and LEAs can use to implement cooperative arrangements between private schools and public vocational education programs. The videotape and other materials were disseminated through four three-day workshops for SEA staff responsible for administering publicly financed vocational education programs. Three-member teams from each SEA as well as select private school representatives were invited to attend these workshops.

Content Development

The initial phase of content development included a review of relevant data; an analysis of federal legislation, rules, and regulations; and a review of the literature on cooperation between private schools and public vocational education institutions. Additional information was obtained through interviews with government officials and administrators of public and private educational agencies.

A state-of-the-art report (see Chapter III) was prepared once this information was gathered. This report provided the background information for conducting field investigations, which was the next step in content development.

The field investigations consisted primarily of review and analysis of available literature and extant data and semistructured interviews, which were conducted by ETS professional staff. Initially, seven states, representing approximately half of the nation's private elementary and secondary schools, were selected as field sites: California, New York, Pennsylvania, Illinois, Ohio, Wisconsin, and New Jersey. Texas and Georgia were added to the list to achieve better geographic balance.

The results of the field investigations are reported in Chapter IV. These investigations uncovered additional barriers to private school students' participation in public vocational programs and led to the identification of some procedures that could be used to increase their participation. Chapter V of this report describes these procedures, which are recommended for use by SEAs and LEAs.

Materials Development

The content development activities provided the basis for the preparation of materials designed to help state and local vocational educators give private school students greater access to federally supported vocational education programs. The primary focus of the materials development was on preparation of a Procedural Guide, a videotape presentation, and supporting materials.

The Procedural Guide describes activities that can be used by SEAs and LEAs to initiate and implement cooperative arrangements between private schools and public vocational education institutions. The Guide covers the following topics:

- The intent and requirements of the law concerning providing nonprofit private school students with access to public vocational education programs
- Publicizing the benefits and opportunities of vocational education programs
- Establishing communications links with the nonprofit private education sector
- The mechanics of establishing cooperative relationships between the nonprofit private and public education sectors

The Guide, which was prepared by ETS staff, was reviewed by the project's Advisory Committee and by private and public school representatives and was then field tested. Although the complete text of the Guide is not included in this report, the procedures recommended for increasing the accessibility of vocational education programs are summarized in Chapter V.

The videotape that was prepared is designed to stimulate communication by familiarizing viewers with legislation relating to private school students, showing some typical barriers facing these students, and describing some procedures that can be used to deal with these barriers.

A script and storyboard for the videotape were prepared and critiqued prior to production. A preliminary 3/4-inch color videotape was then produced for field testing. Along with the Procedural Guide, the videotape was field tested in Georgia, Illinois, New Jersey, and California. About 45 private and public educators were involved in these field tests. The videotape was subsequently modified in light of their recommendations.

Supporting instructional and informational materials for conducting four regional workshops were also prepared. These materials were designed for use in conjunction with the Procedural Guide and videotape.

The supporting materials included lists of private school organizations and state-level private school contact persons, copies of relevant legislative provisions and accompanying rules and regulations dealing with private school students, workshop agendas, and evaluation forms.

Dissemination

Four three-day regional workshops were conducted for SEA staff with lead responsibility for implementing provisions of the Vocational Education Amendments of 1976. The primary purposes of the workshops were:

1. to inform participants about the requirements regarding private school students' access to public vocational education under P.L. 94-482, and about the benefits of meeting those requirements,
2. to work through the Procedural Guide to give participants a general idea as to how it could be used for implementing the provisions of the law,
3. to provide clinical opportunities for the application of the procedures presented in the Guide to the participants' unique situations,
4. to provide participants with materials, including the videotape, and processes for informing other interested parties about the requirements and opportunities of P.L. 94-482, and
5. to make recommendations for increasing the accessibility of public vocational education programs to private school students.

The workshops were held during August and September of 1979 in Denver, Colorado; Atlanta, Georgia; Chicago, Illinois; and Menlo Park,

California. Seventy-three state representatives and eight nonprofit private school representatives attended the workshops. A list of the states that sent representatives to each workshop will be found in Appendix C.

Princeton office project staff conducted the workshops with the assistance of ETS regional office staff. Members of the project Advisory Committee attended the workshops in the capacity of participants as well as presentors.

Three copies of the Procedural Guide, the videotape, and supporting workshops materials were distributed to state representatives attending the workshop. In cases where state representatives were not in attendance, materials were mailed to persons responsible for the administration of vocational education programs.

The project's Final Report, Executive Summary, and Abstract were sent to the U.S. Office of Education's Bureau of Occupational and Adult Education and to the Educational Resources Information Center (ERIC) for national distribution.

CHAPTER III. STATE OF THE ART OF NONPROFIT PRIVATE SCHOOL STUDENTS' PARTICIPATION IN PUBLICLY SUPPORTED VOCATIONAL EDUCATION PROGRAMS

Introduction

The first federal legislation passed to help private school students gain access to publicly funded educational programs was the Elementary and Secondary Education Act (ESEA) of 1965. Since then, provisions requiring private school participation have been added through the Vocational Education Amendments (1968), the Bilingual Education Act (1974), and the Education of All Handicapped Children Act (1975). In addition, the Education Amendments of 1978 greatly strengthened the requirements for the participation of private school students under Title I of ESEA.

This chapter consists of a report on the extent to which private school students take part in public vocational education programs. There are four sections: a review of available data on private schools; an analysis of relevant federal legislation and rules and regulations; a summary of the literature and federal data on vocational education cooperation; and an analysis of barriers to public/private cooperation. Our sources include the results of a literature review and of an analysis of the vocational education legislation as well as information obtained through interviews with government officials and administrators of public and private educational agencies.

Our findings indicate that the development of cooperative relationships between public and private institutions is impeded by philosophical differences, communication barriers, and administrative difficulties. A lack of accurate basic data on private schools and their students further complicates efforts to establish cooperative relationships.

Nonprofit Private Schools: An Overview

Private elementary and secondary schools play a significant role in American education. According to the National Center for Education Statistics (NCES), in 1976-77 there were about 17,950 nonpublic schools --about 17 percent of all elementary and secondary schools. These schools taught about 4.8 million of the 49.1 million elementary and secondary students in the United States.[1]

Although the number of public schools has declined considerably over the past 20 years, the number of nonpublic schools has remained relatively constant. As a result, private schools now comprise a greater percentage of the total than they did 20 years ago.

TABLE 1

NUMBER AND PERCENT OF PUBLIC AND PRIVATE SCHOOLS BY YEAR, 1958-1978

Year	Total Schools	Public	Private	Private as a Percent of Total Schools
1956	146,732	104,427	16,259	11.0%
1966	119,759	73,216	19,946	16.7%
1976	106,272	63,242	17,950 (estimate)[2]	16.7%

Source: National Center for Education Statistics (NCES), The Condition of Education, 1978 Edition (Washington, D.C.: U. S. Government Printing Office, 1978), Table 2.16.

[1] J. Porter and R. Nehrt, Nonpublic School Statistics, 1976-1977 (Advance Report). Washington, D.C.: Department of Health, Education, and Welfare, 1977, p. 2.

[2] For the 1978-79 school year, the Council on American Private Education (CAPE) has identified 19,434 private schools. CAPE officials estimate there are an additional 1000-2000 private schools not included in this survey.

Ironically, the growth in the proportion of private schools has been accompanied by a drop in the proportion of private school students in the nation. Table 2 shows that in 1960 14 percent of all elementary and secondary students were enrolled in nonpublic schools. By 1976, however, the proportion had dropped to a little under 10 percent.[1] While this drop reflects both a growth in public school enrollments during most of this period and a general decline in nonpublic school enrollments, most of the decrease is accounted for by the declining number of students enrolled in Roman Catholic private schools.[2]

TABLE 2
ENROLLMENT IN NONPUBLIC ELEMENTARY AND SECONDARY SCHOOLS (thousands), 1960-1976

Year	Total Enrolled in Nonpublic Schools	Enrolled in Catholic Schools	Enrolled in Other Non-public Schools	Nonpublic as Percent of Total School Enrollment
1960	5,969	5,254	715	14.0
1970	5,655	4,367	1,288	10.9
1976	4,804	3,111 (estimated)	1,123 (estimated)	9.8

Sources: U. S. Bureau of the Census, Current Population Reports (1970, 1977); Porter and Nehrt, Nonpublic School Statistics, 1976-1977.

[1]U.S. Bureau of the Census, Current Population Reports, Series P-20, No. 234. "School Enrollment in the U.S.: 1971." Washington, D.C.: U.S. Government Printing Office, 1972; R. Reischauer, R. Hartman, D. Sullivan, Reforming School Finance, Washington, D.C.: Brookings Institution, 1973, p. 98; Porter and Nehrt, Nonpublic School Statistics, 1976-1977.

[2]R. Reischauer, R. Hartman and D. Sullivan, Reforming School Finance, p. 98.

Most nonprofit private schools are affiliated with religious groups. Although enrollment in unaffiliated private schools is growing (in 1970, 7 percent of all private school students were enrolled in unaffiliated schools, compared to 11 percent in 1977),[1] religious groups still play a dominant role in nonpublic education. Roman Catholic schools enroll most private school students. Table 3 shows the distribution of private schools and students by religious affiliation.

TABLE 3
NONPROFIT PRIVATE SCHOOLS AND RELIGIOUS AFFILIATION, OCTOBER 1976

Affiliation	Schools		Pupils		Graduates	
	Number	Percent	Number	Percent	Number	Percent
All schools	14,757	100.0	4,234,170	100.0	255,083	100.0
Nonaffiliated	2,210	15.0	475,901	11.2	38,201	15.0
Affiliated	12,547	85.0	3,758,269	88.8	216,882	85.0
Baptist	310	2.1	87,917	2.1	3,107	1.2
Calvinist	182	1.2	47,129	1.1	3,111	1.2
* Catholic	8,986	60.9	3,110,972	73.5	188,902	74.1
Episcopal	304	2.1	73,774	1.7	4,946	1.9
Jewish	264	1.8	59,810	1.4	1,856	0.7
Lutheran	1,366	9.3	201,257	4.8	4,034	1.6
**S.D.A.	517	3.5	46,993	1.1	3,348	1.3
Other	618	4.2	130,412	3.1	7,578	3.0

*Roman Catholic (not including Eastern Orthodox)
**Seventh Day Adventist

NOTE: Results are based only on those schools responding to the NCES survey. Data were reported by 14,757 (82.2 percent) of the estimated 17,950 schools believed to be in operation in 1976-77.

Source: Porter and Nehrt, Nonpublic School Statistics, 1976-1977.

[1] R. Reischauer, R. Hartman and D. Sullivan, Reforming School Finance, p. 98.

The table shows that 85 percent of the private schools responding to the survey are affiliated and that 88.8 percent of all private school students attend affiliated schools. Roman Catholic and Lutheran schools comprise 82.5 percent of all affiliated private schools, and they teach 88.1 percent of all students enrolled in affiliated schools.

Investigations of the geographic distribution of private schools show that about half the private elementary and secondary schools in the U.S. are located in only seven states, mostly in the Northeast and Midwest (see Table 4). Further, according to the 1970 Census, 80 percent of private schools are located in either central cities or suburbs (40 percent in each), with the remaining 20 percent in either small towns or rural communities.[1]

TABLE 4

STATES WITH HIGH CONCENTRATIONS OF PRIVATE SCHOOLS, OCTOBER 1976

Rank	States with Private Schools	Number	Percent of U.S. Total
1	California	1,462	9.9
2	New York	1,462	9.9
3	Pennsylvania	1,151	7.8
4	Illinois	1,082	7.3
5	Ohio	694	4.7
6	Wisconsin	693	4.7
7	New Jersey	644	4.4
	TOTALS	7,188	48.7

Note: Based on the estimated 82.2 percent of all private schools responding to the NCES survey.

Source: Porter and Nehrt, Nonpublic School Statistics, 1976-1977, pp. 8, 14.

[1] U.S. Bureau of the Census, Current Population Reports, Series P-25, No. 222, "School Enrollment, October 1970," p. 20.

In summary, over the past two decades, the number of private elementary and secondary schools has remained relatively constant even though the percentage of private schools has increased. From 1960 to 1976, enrollment in private schools, both religious and secular, dropped sharply, from nearly six million to under five million. During that same period, the percentage of students enrolled in private schools dropped from 14 to 10 percent.[1]

Table 5 summarizes the distribution of private school vocational programs in the seven states with large numbers of private schools. One hundred ninety-eight of the 7,188 private schools in those states, or 2.8 percent of all private schools, have vocational programs. Of those 198 schools, 52 (26.3 percent) are unaffiliated, and 146 (73.7 percent) are affiliated. One hundred of the affiliated schools are Roman Catholic, comprising 50.5 percent of all private schools offering vocational programs.

Private Schools and Vocational Education. Vocational education is uncommon in private schools. Less than three percent of the nation's private schools responding to the NCES survey offer their own vocational programs.[2] There is, however, a large variation in vocational programs by religious affiliation. Nationwide, 65 percent of the private schools

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[1]U.S. Bureau of the Census, Current Population Reports, Population Characteristics. "School Enrollment -- Social and Economic Characteristics of Students," October 1976.

[2]Porter and Nehrt, Nonpublic School Statistics, 1976-1977, pp. 5,6.

Table 5

DISTRIBUTION OF VOCATIONAL AND TECHNICAL PROGRAMS IN PRIVATE SCHOOLS BY STATE AND RELIGIOUS AFFILIATION
October 1976

Rank	States with Private Schools	Private Schools with Voc-Tech Programs		Unaffiliated Private Schools with Voc-Tech Programs		Affilitated Private Schools with Voc-Tech Programs		Roman Catholic Private Schools with Voc-Tech Programs	
		No.	% of Private Schools	No.	% of Private Schools with Vo-Tech Programs	No.	% of Private Schools with Vo-Tech Programs	No.	% of Private Schools with Vo-Tech Programs
1	California	55	3.8%	23	41.8%	32	58.2%	12	21.8%
2	New York	44	3.0	11	25.0	33	75.0	19	43.2
3	Pennsylvania	44	3.8	9	20.5	35	79.5	32	72.7
4	Illinois	21	1.9	5	23.8	16	76.2	14	66.7
5	Ohio	10	1.4	2	20.0	8	80.0	7	70.0
6	Wisconsin	15	2.2	0	0	15	100.0	10	66.7
7	New Jersey	9	1.4	2	22.2	7	77.8	6	66.7
Total, 7,188 Schools (48.7% of private schools in U.S.)		198	2.8	52	26.3	146	73.7	100	50.5

Note: Results are based only on those schools responding to the NCES survey. Data were reported by 82.2 percent of the estimated 17,950 schools believed to be in operation in 1976-77.

Source: National Center for Education Statistics. Nonpublic School Statistics, 1976-77, pp. 8, 14.

offering vocational/technical programs are religiously affiliated.[1] Nearly 65 percent of these schools are Roman Catholic. The proportion is even larger in the seven states with high concentrations of private schools. There, 73.7 percent of all affiliated schools offer vocational programs, and 68.5 percent of these are Catholic.

These figures conceal an important feature of the distribution of vocational programs in private schools. While 35 percent of all private schools with vocational programs are unaffiliated, these schools make up only 11 percent of all private schools. Within the small percentage of private schools with vocational programs, therefore, schools not linked to religious groups offer vocational education approximately three times more often than their share of the total would suggest.

Private Schools and Federal Vocational Education: Legislative Background

The first expression of federal interest in the vocational education of private school students can be seen in Part G of the 1968 Vocational Education Amendments, which says that all states wishing to participate in cooperative vocational education programs must make provisions in their state plans for the participation of students from nonprofit private schools. States must guarantee that students whose educational needs are of the type for which the programs are designed will be served to an extent consistent with the number of students enrolled in an area's nonprofit private schools.[2]

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[1] Porter and Nehrt, Nonpublic School Statistics, 1976-1977, pp. 5,6.

[2] P.L. 90-576, Sec. 173(a)(6).

As defined in the legislation, "cooperative vocational education" means a program for persons, who through written cooperative arrangements between the school and employers, receive instruction that includes required academic courses and related vocational training. These experiences are to be planned and supervised by the school and employers so that both contribute to the student's educational experience and to his or her employability. Work periods and school attendance may be organized by alternate half days, full days, weeks, or other periods.[1]

By 1976, there was evidence that the provisions regarding the participation of private school students had been largely ignored. The House Committee on Education and Labor emphatically expressed its dismay:

> The Committee wants to emphasize its belief that the funding of programs involving private school children have not been implemented as fully as we intended when these provisions were included in the Act of 1968. We urge the Office of Education to take more vigorous steps to implement these provisions by securing adequate consultation with appropriate private school officials at state and local levels, by securing proper identification of eligible private school children, by assessing adequately the needs of such children for these services, and by providing services to these children in a manner that will best meet their needs. The Committee bill requires the membership of representatives of non-profit private schools on the national and State advisory councils on vocational education in order to help secure the proper implementation of these provisions.[2]

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[1] P.L. 90-576, Sec. 175.

[2] U.S. Congress, House, The Vocational Education and National Institute of Education Amendments of 1976, House Report No. 94-1085, to accompany H.R. 12835, 94th Congress., 2nd Session, p. 46.

As finally enacted, the Vocational Education Amendments of 1976 require assurances for private nonprofit student participation under Subpart 2, Section 122 (f), in cooperative vocational education programs; Subpart 3 Program Improvement and Supportive Services, Section 132 (b) Exemplary and Innovative Programs; and Subpart 4, Special Programs for the Disadvantaged, Section 140 (b). The 1976 Amendments strengthen considerably the assurances states must make regarding the participation of private school students. Among the key provisions are the following:

Subpart 1--General Provisions:

- The national and state advisory councils for vocational education must include individuals who represent and are familiar with nonprofit private schools.[1]

- When formulating their five-year plans for vocational education, all states are required to consult the state agency responsible for planning postsecondary education, which planning reflects programs offered by public, private nonprofit, and proprietary institutions, including those offering occupational programs at a less-than-baccalaureate level.[2]

- Federal funds may be used to pay up to 100 percent of the cost of programs that: encourage students in nonprofit private schools to attend cooperative vocational programs;[3] enable them to participate in exemplary and innovative education projects;[4] assist disadvantaged nonprofit private school students by setting up special programs for them.[5]

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[1] P.L. 94-482, Sec. 105(a)(9).

[2] P.L. 94-482, Sec. 107(a)(1)(I).

[3] P.L. 94-482, Sec. 122(f).

[4] P.L. 94-482, Sec. 132(b).

[5] P.L. 94-482, Sec. 140(b)(2).

Subpart 2--Basic Grant:

- Basic Grant funds may be used for the provision of vocational training by private, profit-making vocational schools where such schools make a significant contribution to reaching the goals of the state plan.[1]

- Basic Grant funds may be used to establish cooperative vocational programs provided that nonprofit private school students' needs have been taken into account.[2]

Subpart 3--Program Improvement and Support Services:

- Under this subpart, funds may be used by state research coordinating units to enter into contracts for exemplary and innovative programs, especially to minimize sex-role stereotyping and sex bias in vocational education, provided that such contracts take into account the needs of students in nonprofit private schools.[3]

Subpart 4--Special Programs for the Disadvantaged:

- Funds set aside for disadvantaged students may be granted to LEAs only if provision has been made for area nonprofit private school students to participate.[4]

Thus, although federal vocational education policy has traditionally emphasized participation of private school students in cooperative vocational education programs, federal concern with private school students was broadened to cover other vocational programs in 1976. The 1978 Amendments to the Elementary and Secondary Education Act (ESEA)

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[1]P.L. 94-482, Sec. 120(a)(1)(n).

[2]P.L. 94-482, Sec. 122(f).

[3]P.L. 94-482, Sec. 132(b).

[4]P.L. 94-482, Sec. 140(b)(2).

not only reinforced federal vocational education policy but also covered areas other than vocational education. The enforcement clauses in the 1978 Amendments are stronger than their counterparts in the Vocational Education Amendments of 1976. The 1978 Amendments apparently represent one step in a growing federal interest in providing all students with access to federal education programs.

Rules and Regulations. Before legislation is transformed into government action, laws must be converted into rules and regulations that govern program administration. For private school participation in cooperative vocational programs, administrative regulations (effective October 1, 1976) under the 1968 Amendments require that:

> The state plan shall set forth the policies and procedures to be followed in cooperative vocational education programs approved and funded under part G of the Act (Cooperative Vocational Education), which assures that, to the extent consistent with the number of students enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which such a program is designed to meet, provision has been made for the participation of such students in accordance with the requirements of Sec. 102.7.[1]

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[1]Code of Federal Regulations, 148, Sec. 102.101, Participation of Students in Nonprofit Private Schools, p. 148. In addition, the General Provisions--Sec. 102(F)--governing the participation of private school students vocational education programs mandate:

(a) Each program and project carried out under parts B...D, and G shall be designed to include, to the extent consistent with the number of students enrolled in private nonprofit schools in the geographic area served by the program or project, vocational education services which meet the needs of such students. Such services may be provided through such arrangements as dual enrollment, educational radio and television, or mobile or portable equipment, and may include professional and subprofessional services.

(b) The vocational education needs of students enrolled in private nonprofit schools located within the geographic areas served by the program or project, the number of such students who will participate in

On October 12, 1976, President Ford signed the Education Amendments of 1976, which included the Vocational Education Amendments (Public Law 94-482, Title II). The previous laws, rules, and regulations remained in effect for another year while the Office of Education (OE) prepared new regulations.

On November 10, 1976, OE published a Notice of Intent to Issue Regulations based on the new legislation.[1] The Notice contained a summary of the new Amendments, listed 15 issues to be considered in writing new regulations, and invited the public to comment before they were finalized. None of the 15 issues bore directly upon students in nonprofit private schools; private school students were mentioned only once, in the section on exemplary and innovative programs.

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the program or project, and the types of vocational education services which will be provided for them shall be determined, after consultation with persons knowledgeable of the needs of those students, on a basis comparable to that used in providing such vocational education services to students enrolled in public schools. Each application submitted by the local educational agency to the state board shall indicate the number of students enrolled in private nonprofit schools who are expected to participate in each program and project proposed by such agency and the degree and manner of their expected participation.

(c) Public school personnel may be made available on other than public school premises only to the extent necessary to provide vocational education services required by the students for whose needs such services were designed, and only when such services are not normally provided at the private school....

(d) Any program or project to be carried out on public premises and involving joint participation by students enrolled in private nonprofit schools and students enrolled in public schools shall include such provisions as are necessary to avoid forming classes that are separated by school enrollment or religious affiliation.

[1] Federal Register 218, Part IV, 11/10/76, pp. 49742-49750.

On April 7, 1977, the Office of Education published a set of proposed rules and regulations based on the 1976 Amendments and the comments received in response to the Notice of Intent.[1] The proposed rule on private school students' participation in cooperative vocational programs required assurances that:

> To the extent consistent with the number of students enrolled in private nonprofit schools in the area to be served, whose educational needs are of the type which the program is designed to meet, provision has been made for the participation of these students in the program.[2]

Public comments on the proposed rules were incorporated, and the final regulations were published on October 3, 1977.[3] One comment on the private school regulation noted:

> The regulation governing the participation of students in nonprofit private schools in cooperative vocational educational programs is taken almost verbatim from the corresponding statutory language...the regulation ignores the (need)... to take more vigorous steps to implement the statutory provisions for the funding of programs involving students enrolled in nonprofit private schools. Without further elaboration in the regulation to reflect these concerns... there will not be adequate safeguards to assure that eligible students enrolled in nonprofit private schools will participate in the programs on an equitable basis.

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[1] 42 Federal Register 67, Part II, 4/7/77, pp. 18542-18585.

[2] 42 Federal Register 67, Part II, 4/7/77, p. 18566.

[3] 42 Federal Register 191, Part VI, 10/3/77, p. 53881.

In response to the comment, OE stated:

> A new regulation, Sec. 104.533, is added to the section on cooperative vocational education programs to reflect [these needs]....In accordance with this regulation, the state must consult with the appropriate nonprofit private school officials at the state and local levels in order to make provision for the participation of students enrolled in nonprofit private schools. In addition, LEAs receiving funds for cooperative programs shall identify the eligible students, assess their needs, and provide them with the types of programs and services which will most effectively meet their needs. The personnel, materials and equipment necessary to provide these cooperative vocational education programs and services shall remain under the administration, direction and control of the LEA.[1]

In its final form, the rule reads as follows:

> Sec. 104.533. Students in nonprofit private schools. (a) A state using funds under its basic grant [Section 120 of the Act] for grants to local educational agencies for cooperative vocational education programs shall consult with the appropriate nonprofit private school.
>
> (b) Each local educational agency receiving funds from the state for cooperative vocational education programs shall:
>
> (1) Identify the students enrolled in nonprofit private schools in the area served by the local educational agency whose educational needs are of the type which the cooperative vocational education programs and services may benefit; and
>
> (2) Assess adequately the needs of the students identified in subparagraph (1)... for the cooperative vocational education programs and services being offered; and
>
> (3) Provide the students identified in subparagraph (1) of this paragraph with the opportunity for cooperative vocational education programs and services in a manner which will most effectively meet the needs of these students.

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[1] Code of Federal Regulations, Vol. 45, Sec. 104.533.

> (c) The personnel, materials and equipment necessary to provide cooperative vocational education programs and services to nonprofit private school students shall remain under the administration, direction and control of the local educational agency.
>
> (d) Cooperative vocational education programs carried out by local educational agencies which include students enrolled in nonprofit private schools may be supported up to 100 percent with Federal funds.
>
> (e) Federal funds used to support cooperative vocational education programs which include students enrolled in nonprofit private schools will not be commingled with state or local funds so as to lose their identity.[1]

The final version of the Rules and Regulations contained similar language for Exemplary and Innovative Programs (including the reduction of sex bias and sex stereotyping) and for Special Programs for the Disadvantaged.[2] (See Appendix B.)

The 1976 legislative changes and the resulting rules and regulations are clear expressions of the federal interest in extending vocational education opportunities to students in private schools.

Review of Literature and Federal Data

Scant literature exists on cooperation between public and private schools in vocational education. A computerized search of the Education Resources Information Center (ERIC) data base produced no relevant literature. Other investigations turned up only one pamphlet-length essay on cooperation between private and public schools in general.[3]

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[1] Ibid.

[2] Ibid., Sec. 104.706 (b)(2) and Sec. 104.803.

[3] G. Elford, "Public and Private School Cooperation," in the series Trends in Education. Columbus, Ohio: Ohio University Council for Educational Administration, n.d.

Attempts to discover relevant literature also included consultation with the American Vocational Association, the National Institute of Education, the American Council on Education, the Council on American Private Education, and Professor Donald Erickson of the University of San Francisco, who is assembling materials on private education. None of these sources were aware of any academic or professional literature on the subject.

Much of the available information is anecdotal. For example, an article appearing in the Weekly Post of Newark, Delaware,[1] described a successful program of cooperation between St. Mark's High School (private, Roman Catholic) and the local area vocational school.

A recent review of the literature on contractual relationships between nonprofit and proprietary schools and public schools sheds some light on the problems of establishing relationships between private institutions and public education agencies.[2] That study showed that effective contractual relationships between public agencies and private schools have been hampered by the vague status of the law in some states and by administrative barriers. In addition, according to the study negative perceptions of private schools by some public school officials appear to limit the willingness of public school officials to cooperate with private schools. Examples of success in cooperation between public

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[1] S. Liotta, "St. Mark's gets acquainted with Hodgson," The Weekly Post, October 25, 1978.

[2] T. Hartle and E. Rosenbaum, "Private Vocational Schools and Public Policy." Draft Final Report submitted to the U.S. Office of Education, prepared under OE contract.

and private schools seem to be found only where there is considerable personal contact between representatives of the public and private schools.[1]

Data Collected by Federal Agencies. The federal government offers several sources of data on private elementary and secondary schools. The U. S. Census Bureau gives figures on public and nonpublic schools in its annual Current Population Reports as well as in its decennial Census of Population. Some of this information is presented in this report. The data include studies of enrollments, numbers of schools, and their geographic distribution. Much of this information is summarized in The Condition of Education, published annually by the National Center for Education Statistics (NCES).

The most comprehensive federal collection of data on private schools appears in Nonpublic School Statistics, 1976-1977, also published by NCES. This study describes the results of an October 1976 survey of all private nonprofit elementary and secondary schools. Of the estimated 17,950 schools, NCES received replies from 14,757, a response rate of 82.2 percent. These schools are described by location, number of students, religious affiliation, and involvement in several selected federal programs; their participation in federally funded vocational programs is not recorded.

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[1]See J. Thompson, "Contracting Vocational Programs: A Viable Alternative in Indiana," American Vocational Journal, January 1976, pp. 34-35; and F. Sanns, "Public/Private School Cooperation Opens a Door for 45 Students," American Vocational Journal, November 1976, p. 27.

In the private school community, the Council on American Private Education (CAPE) collects little data. The National Catholic Educational Association, however, collects some basic information on the participation of its schools in federal programs.[1]

To determine the extent of cooperation between private schools and cooperative vocational education programs, project staff examined 12 state plans for vocational education filed with the Office of Education's Bureau of Occupational and Adult Education.[2] Although not required by the Bureau of Occupational and Adult Education, none of the plans specified the proportion of cooperative vocational education funds used specifically for private school students. Federal procedures for reporting data from the state and local education agencies do not require that such information be reported to OE. Instead, the Bureau has developed a checklist of requirements against which the state plans are tested for compliance. These requirements merely restate the rules and regulations derived from the legislation. The state plans examined for this study contained only the minimum required restatements of these rules and regulations, and they were judged to comply with the Bureau's standards.

The Bureau has another enforcement arm, the Unit for Management Evaluation and Review of Compliance (MERC). Instead of reviewing self-

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[1]See C. Ganley, ed. Catholic Schools in America. Denver, Curriculum Information Center, National Catholic Educational Association, 1977.

[2]The states were Texas, Ohio, New York, Alaska, Vermont, Montana, Connecticut, North Carolina, California, Michigan, Alabama, and Iowa.

reported statements of state and local activity, the MERC office conducts on-site reviews of state and local administration of vocational education. The office conducts 10 state reviews each year; to date, it has completed 30 reviews and is in the process of completing 10 more. An examination of reports on the 30 completed reviews turned up no more information than state plans contained. According to a MERC official, the MERC reviewing procedure included examination of any correspondence with private school officials regarding their students' interest in cooperative education, but the reviewers were required to report to Washington only the fact of compliance, not the degree.

In short, no reliable figures on private school participation in vocational education are collected at the federal level. This lack of data was one of the causes of the controversy in April 1978 between former HEW Secretary Califano and representatives of various private school organizations. On February 28, 1978, Califano claimed in Congressional testimony that federal aid to private school students had reached a certain level (between $100 and $250 million). Private school groups challenged the figure by presenting their own ($54.2 million).[1] An OE official has since stated that federal data were not available to verify either claim.

It is very likely that the lack of basic background data discourages private school participation in federal programs such as cooperative vocational education. Without accurate information on the number of

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[1]For more details, see the United States Catholic Conference News, April 13, 1978, "Catholic School Officials Dispute HEW Secretary on Pupil Aid Figures," and attached memo.

private schools, the number of students enrolled, and the kinds of programs offered at these schools, federal, state, and local policymakers have no basis on which to design programs. The National Center for Education Statistics is now reviewing its collection of information on nonpublic schools, intending to improve its reporting of participation in federally funded programs.[1] It is estimated that the new procedures will be in operation in about three years. Until then, the true situation concerning private school programs will remain a matter of conjecture.

Barriers to Participation of Private Schools in Public Vocational Education Programs

Although data on public/private cooperation in vocational education is sparse, our interviews revealed several barriers to cooperative efforts.

Communications Barriers. Communication among private schools is poorly developed. Schools with religious affiliations are generally administered by their parent churches, which rarely work together on matters of mutual concern to their schools. Much of the lobbying that takes place is undertaken by the United States Catholic Conference, whose schools compose the largest proportion of private schools. Schools without religious affiliations frequently have no ties to national organizations and lack any means to identify public programs for which they are eligible.

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[1]This review is being conducted by the Statistical Analysis Group in Education (SAGE) as part of a series of seminars on the "meaning and significance" of NCES statistics. A session on nonpublic school statistics was held on October 31, 1978.

The Council for American Private Education (CAPE) may provide a vehicle for improved communication among private schools. Founded in 1971, CAPE is an association of 15 national organizations representing private schools.[1] CAPE's stated purpose is to encourage communication among its members as well as between these organizations and the federal government. In addition, CAPE represents private schools on public policy matters of mutual concern. In recent years, CAPE has tried to determine the total number of private schools in the United States. Without such basic information, it is difficult, if not impossible, to inform all private schools of public programs for which they may be eligible.

Communications between private schools and public education agencies may also be poorly developed. One person said during an interview that many LEAs do not know the number of private schools or the location of all private schools within their boundaries. Another person said that one LEA had successfully located private schools within the district only by using the town's sewer records. Such a lack of information may prevent LEAs from providing vocational education for eligible private school students.

Philosophical and Attitudinal Barriers. The historic antipathy between public and private schools also hinders cooperation. Although federal concern with private school students dates to the passage of the Elementary and Secondary Education Act of 1965, a residual feeling that it is improper for private school students to benefit from public funds

[1]"CAPE: A Brief Description." Washington, D.C., CAPE, October 1978.

remains.[1] Although there is a clear federal mandate that eligible private school students be served by vocational education programs, several of the people who were interviewed said that public school officials often avoid making more than a gesture to private schools. One person noted:

> ...They [public school officials] can make a minimum effort that effectively destroys any chance of cooperation in vocational education. Let's say a public school administrator creates a schedule which places his school's vocational program between 11:00 a.m. and 2:00 p.m. When the schedule is fixed, the administrator calls the private school -- usually just a couple of days before the beginning of the term -- to ask if there are any interested students. Since it may be impossible to bus the private school students to the public schools in the middle of the day, the guidance counselor may not accept the offer. In this way, however, the public school administrator fulfills his legal obligation to contact the relevant private school while avoiding the necessity of actually accepting any students.

Several people suggested the public school officials' attitudes may be influenced by budget concerns. In the words of one:

> ...Some of them [public school officials] figure that if they serve kids from private schools, it leaves them less money for their own students. Vocational education is expensive and with the taxpayers revolt, these guys are looking to save money anywhere they can. If they can save it by not serving a few kids from some private schools, they'll do it.

Private schools may also avoid participating in public programs. Some reluctance is based on fear that accepting public money will force

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[1] M. Gaffney, L. Medina, R. Harper. A National Study of State and Outlying Area Statutes and Regulations Related to Contracting with Private Vocational Training Sources for Vocational Instruction. Washington, D.C., National Foundation for the Improvement of Education, 1978.

the private school to accept public control. This is a special concern for religious schools, which wish to retain the power to set their own educational policies and curricular standards. These schools would rather do without the benefits of federal programs than risk the possibility of regulation.

Another attitudinal barrier to private school participation is disinterest. Limited budgets have forced private schools to concentrate their energy on programs that require comparatively little financial support and/or on programs of primary interest to most students and their families. As a result, most private schools describe themselves as college preparatory, not career-oriented, and vocational education programs receive little attention. Thus, even in private schools where there is interest in other federal programs, vocational education is not always of interest.

Structural and Administrative Barriers. In many states, laws governing cooperation between public and private schools block private school participation in cooperative vocational programs. Gaffney's study of laws governing contractual arrangements between LEAs and private vocational schools[1] shows that conflicting state and federal laws in many cases restrict cooperation between public and private education agencies. During an interview, one person described the problem in his state this way:

> We're caught in an educational Catch-22 when we try to get private school students into the co-op programs. A kid has to enroll as a public school stu-

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[1] M. Gaffney, L. Medina, R. Harper. A National Study of State and Outlying Area Statutes and Regulations Related to Contracting with Private Vocational Training Sources for Vocational Instruction. Washington, D.C.: National Foundation for the Improvement of Education, 1978.

> dent if he or she wants to go. Some parents don't see the point of paying their good money on tuition to send their kids to private schools just to have them enroll as full-time public school students to take one course. And then there's the question of district boundaries. If the public school district in which the private school is located has a co-op program, the kids have to go to <u>that</u> co-op school, even if there's another (co-op) school in another district, which is closer to his private school.

High tuition costs of most private schools form another barrier. One person suggested that the expense of sending children to private schools prevented those children from joining federal programs. He explained:

> If parents pay on the order of $1,000 each year to send each of their kids to private schools, they're going to want to get their money's worth. If you even suggest to them that part of the time they are paying for should be spent at a public facility, these parents will tell you to forget about it. If they wanted to send their kids to public school, they would have done so in the first place.

Administrative procedures may also limit participation. In many states, lack of interest in cooperation is shown by the absence of officials assigned to foster cooperation. One person stated:

> By my count, there are 14 officials at the state level in the entire United States who have it written into their job descriptions to promote or manage the participation of private schools in federal programs. That's 28 percent of all states. And I just can't believe that even 10 percent of the LEAs in the country have such officials.

Several of the people who were interviewed mentioned that OE had failed to frame clear administrative guidelines for private schools and LEAs to use for effective cooperation. Although the rules and regulations cited earlier clearly state that cooperation is the responsibility

of the LEAs and SEAs, there are no clear, well-publicized procedures for these agencies to follow. One pamphlet gives a general description of the federal mandate but fails to outline specific actions for SEAs or LEAs.[1] Complaints about the lack of guidelines came most frequently from representatives of private school organizations. One asked:

> How can the Office of Education expect these programs to get set up if the LEAs don't have a specific set of procedures to follow? Given their [the LEAs] obvious lack of interest in helping, they'll use any excuse to avoid getting involved in cooperation. Lack of clear instructions is the best excuse imaginable.

Private school staff also attributed some problems to present federal rules and regulations. Several suggested that these be modified to require that private school officials be invited to participate in designing the state plan for vocational education and the area's vocational program, and preparing statements of procedures to be followed by the LEA and of provisions for the cutoff of federal funds in the event of noncompliance.

Summary and Conclusions

Our interviews show that the lack of federal data on private school participation in federal vocational education programs is very likely the largest barrier to cooperation between public and private schools.

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[1]See "Federal Programs Serve the Nation's School Children--Public and Nonpublic." U.S. DHEW (OD) 77-00005, U.S. GPO Washington, D.C., March 1977 (p. 12). Also see "Handbook for Private School Administrators for Effective Participation in Federal Education Programs Administered by the U.S. Office of Education," Washington, D.C., U.S. GPO, November 1974 (p. 38). This booklet directs all private schools interested in participating in cooperative vocational education programs to contact their SEA (p. 30).

While there is anecdotal evidence of some cooperation, the available literature says nothing about the factors that facilitate or prevent it. The people who have been interviewed have suggested that there are several kinds of barriers--philosophical, communicative, and administrative--that may limit the amount of cooperation in this area. Several steps for increasing the cooperation have been suggested, but their usefulness cannot be determined until more data are available.

CHAPTER IV. BARRIERS TO THE PARTICIPATION OF NONPROFIT PRIVATE SCHOOL STUDENTS IN FEDERALLY SUPPORTED VOCATIONAL EDUCATION PROGRAMS

Introduction

A series of case-study interviews were conducted in nine states to assess the level of private school student participation in vocational education programs and to determine the kinds of barriers that may block cooperative efforts between the public and private sectors. Interviews were conducted with state and local and nonprofit private and public school officials.

The interviews confirmed the principal finding of the literature and data reviews: although federal legislation encourages the participation of private school students in federally funded vocational education programs, cooperative relationships are rarely established. Only in New Jersey, Ohio, and Illinois did we find a significant number of cooperative programs. In the other states (Wisconsin, Georgia, Texas, California, New York, and Pennsylvania), we found limited evidence of public/private cooperation.

The access of private school students to public vocational education programs is being restricted for several reasons. In some cases, limited access is attributable to state and local education officials who have restricted private school participation. There is also a certain unwillingness on the part of some private schools to accept publicly funded services and a lack of interest in vocational education programs. Other barriers result from a lack of knowledge about the provisions of the law and the absence of effective communication between public and private officials.

For purposes of simplification, our analysis will focus on four kinds of barriers: philosophical and attitudinal, communications, financial, and structural administrative.

Philosophical and Attitudinal Barriers

Distrust or Apathy. As discussed earlier, the historic distance between the public and private schools and the feeling among some public school officials that it is improper for private school students to benefit from public funds continue to prevent cooperation in education despite passage of the Elementary and Secondary Education Act of 1965. Indifference or, in a few instances, hostility to private school students inhibits efforts to establish cooperative relationships. Some of the opposition to private schools is based on the premise that these schools have traditionally been divisive. One private school counselor noted that the local public school officials seemed to feel that once students enroll in private schools, they are no longer important. "They don't want to admit that, because their parents are taxpayers. These students are entitled to be served." A private school principal described an "us-against-them mentality" with which private school students are seen as "outsiders." In several states, this mentality has been largely overcome through the use of area vocational schools. Students using these facilities are seen as vocational education students and not as public or private school students. This is in contrast to the "outsider" mentality that hinders cooperation when the vocational education programs are conducted in a comprehensive public school.

Private Schools' Academic Focus. A related barrier is the assumption by public school officials that private schools, which usually emphasize an academic/college preparatory program, would have little interest in or need for vocational education programs. Several public school representatives suggested that private schools provide inadequate vocational guidance or none at all to their students. Some private school officials admit to a strong bias in favor of academic programs in private schools.

One individual commented that vocational education is often seen as a program for the educationally disadvantaged and for low-income groups. Parents of private school students--some of whom are from low-income groups--see education as leading to the "good life" and are opposed to their children taking vocational technical courses. A private school principal noted that he frequently experienced problems with students who wanted to pursue vocational programs but whose parents wanted them to be in academic programs. The potential enrichment and balance that vocational education can offer as a complement to the liberal arts curriculum is often ignored or judged to be beyond the range of available resources. Moreover, some private schools' limited budgets force them to concentrate their energy on programs that require comparatively little support and/or on those programs that are of primary interest to most students and their families. As a result, most private schools emphasize college-preparatory programs and frequently neglect vocational education.

Fear of Public Control. Private schools may also avoid participating in public programs because they fear that accepting public money will lead to public control. This is a special concern of certain

church-affiliated schools that wish to set their own educational policies and curricular standards. These schools would rather do without the benefits of federal programs than risk the possibility of federal intervention and regulation.

Some private schools avoid federal programs because of the paperwork involved and the administrative costs. One Catholic official suggests that this is why some Catholic school principals refuse to take advantage of federal breakfast and lunch programs.

Communication Barriers

Lack of Knowledge. A frequently cited barrier to greater public/private cooperation is the lack of effective communication between public and private education officials. Private schools are likely to be unaware of public programs for which they are eligible, and public schools have difficulty in assessing the interest of private schools in participating. As mentioned earlier, some LEAs apparently do not even know the number and location of the private schools within their boundaries.

This situation is far from universal. Several states (including California, New York, and New Jersey) publish lists of private schools within their borders. These lists are distributed to LEAs to enable the school districts to deal with all private schools as necessary.

Lack of Contact Person. The poor communication between public and private schools often means that these officials lack contact persons to facilitate cooperative ventures. Private schools complain that in most state and local education agencies there is no individual whose primary concern is private education. If there is one, that individual may be a junior staff member or may be unfamiliar with vocational educa-

tion concerns. Public officials, on the other hand, believe that private schools deal with public programs infrequently and thus rarely designate an individual to serve a liaison function. Thus, when public officials need to communicate with private schools, they frequently do not know whom to contact.

Private School Communications. A lack of communication among private schools themselves presents another kind of barrier to greater utilization of public programs. Schools with religious affiliations are generally administered by their parent religious bodies (for example, private schools are represented in Washington by the Council for American Private Education, the National Catholic Educational Association, and the United States Catholic Conference). But the various religious bodies only rarely work together on matters of general concern. In some cases, schools without religious affiliations have no ties whatsoever to national organizations and lack any means to identify public programs for which they are eligible. Further, as one public school representative who has established cooperative vocational education programs with several Catholic schools said, in some cases communication between diocesan officials and individual school principals is poorly developed.

Financial Barriers. Although the legislation authorizing public/private cooperation in vocational education allows the use of federal funds to pay 100 percent of the cost of such programs, the financial barriers to cooperation are serious. These barriers stem from both private and public school concerns. As mentioned earlier, one private school official asserted that some public school officials avoid serving private school students because the programs are expensive and they want to use the available money for their own students.

In some cases, public school officials sought to save money by not serving public as well as private school students. Moreover, some private school officials have expressed concern about the financial impact of cooperation on their tuition income. Parents may want a partial refund of tuition money if their children spend part of the day away from the private school.

Operational Costs. A major financial constraint is the logistical cost of operating a program once it is designed. Several public school educators mentioned that the cost of busing private school students to public facilities is prohibitive. The complexities of scheduling create another problem. Administrators in one school district cited the cost of hiring additional vocational education instructors as a reason for opposing the establishment of cooperative relationships.

The cost of providing services for private school students may exceed the amount that is provided. One New Jersey school district turned down some $3,000 in federal funds rather than provide cooperative vocational education for students from private schools. "The costs of bringing these kids in far outweighed any federal funds we would have received," a staff member explained.

Even when cooperation is well established, costs remain high. One private school administrator reported that his school had to hire three individuals to teach half-day sessions to vocational education students.

State Financial Practices. State administrative practices constitute another financial barrier to cooperative relationships. Several private school officials noted that even though federal funds are intended to be used for federally mandated goals, states tend to regard the federal money as theirs and use it for their own purposes. In one

state, for example, federal vocational funds are used at the local level to pay for facilities, materials, and miscellaneous administrative costs, while state and local tax revenues are used to support the instructional program. Because this state prohibits public assistance to nonprofit private schools, students at those schools are denied access to federally supported programs of vocational education.

Tuition. As mentioned earlier, another financial barrier to cooperative programs may be the tuition charged by private schools. Some parents of private school students feel that if their children are receiving less than full-time instruction, they should pay less tuition. Several of the people who were interviewed suggested that the reluctance of some private schools to adopt tuition-refund policies discouraged parents from exploring vocational education options. One private school teacher conceded that it would be logical for parents to want a tuition refund if their children weren't attending full-time but said that the fixed costs of private schools do not decrease appreciably when a few students leave for a few hours each day. The revenue from the tuition of students taking vocational training is needed to operate the private school. Furthermore, if students--usually juniors or seniors--enroll full time in vocational education programs, there is a total loss of anticipated tuition income.

Structural Administrative Barriers

Conflicting State Policies. In many states, laws governing the public and private education sectors block private school participation in vocational education programs. State policies regarding district boundaries, for example, may inhibit cooperation. As mentioned earlier, some private school students are required to travel a long distance

to the vocational program because the closest program happens to be in another district. At times, such procedural complications may serve merely as an excuse to avoid cooperation.

Comprehensive High School and Area Centers. The difficulties encountered in implementing cooperation between public and private schools are intensified when the vocational education program is offered in a comprehensive public high school that is the nearby competitor and at times a "rival" of the private high school. Cooperation develops more readily when the private school can join other public school students in attending an area vocational education center that augments, but does not in any way directly compete with, the public and private schools.

Ignorance and Disinterest. A large number of public and private school staff at both the state and local level are apparently unaware of the provisions of the Vocational Education Amendments of 1976 and the rules and regulations connected with them. As a result, public school officials may not offer to establish cooperative relationships and private school officials may not encourage the establishment of these programs. One state official criticized the Bureau of Occupational and Adult Education in the U.S. Office of Education for failure to keep states and local schools informed about the law and its requirements. He noted:

> There is such a wide variety of policies and regulations that sometimes we just don't know about them all. Those guys [the Bureau] should spend more time informing us of all the relevant provisions we have to deal with.

Some private school officials thought this lack of knowledge resulted from disinterest on the part of state education department officials.

One person, for example, pointed out that there was no person in his state department assigned to private school issues and too few elsewhere. Another person suggested that a major problem might lie with the state vocational education administration agencies. These agencies, he contended, are very powerful and frequently operate outside normal state department of education channels:

> It's a real "club" the voc-ed people have. They basically do what they want in their own fashion. They are conservative and want to keep on doing primarily what they've been doing for the last thirty years; that's why Congress has had so much trouble getting them to serve the disadvantaged and handicapped. To them, the notion of serving private school kids is something of an anathema.

Poor Planning. Another criticism was that there is poor planning at the state and local levels. Private school educators suggested that some states disregard federal requirements regarding citizen participation in the following ways: copies of the proposed state plan may be unavailable before hearings on it, meetings may not be adequately publicized in advance, and hearings may be held at inconvenient times and often closed quickly. One private school official recounted the following story:

> The public hearing to discuss the state plan for vocational education was scheduled for 3:00 to 4:00 p.m. I showed up at 3:15 and, honest to God, the meeting was closed for lack of comment. The plan wasn't available before the hearing, so interested parties did not have anything to comment on.

In several states, however, state vocational education officials said that private school representatives did not attend hearings to discuss the state plan.

Local-level planning may also fail to include any consideration of the needs of private school students. It appears that few local education agencies make a serious effort to annually access the needs of all students in the area as required by federal law. Almost all of the local education agencies studied carried out assessments solely to determine how interested private school administrators were in having their students participate in public programs of vocational education. Rarely were the students themselves directly involved in the assessment process. Furthermore, the needs of private schools were assessed only in the context of existing vocational program offerings. To further complicate the situation, correspondence with private administrators was frequently sent late in the school year and contained sketchy descriptions of the vocational offerings. Consequently, there was seldom any follow-up by either nonprofit private school administrators or agency officials. Some private school officials indicated that no efforts have ever been made by their schools to assess the vocational needs or interests of their students.

Lack of Outreach Programs. Few states actively promote the enrollment of private school students in vocational education programs. One private school official suggested that state and local education agencies should be required to undertake outreach programs to inform private schools about the provisions of the legislation. As mentioned previously, several of the people who were interviewed said that the Office of Education had failed to frame clear guidelines for the SEAs and LEAs to use to implement the provisions of the legislation. The rules and regulations clearly state that SEAs and LEAs are responsible for cooperation, but there is no clear, well-publicized set of procedures for these

agencies to follow. Several people suggested that the rules and regulations themselves be modified to include both specific procedures to be followed by SEAs and LEAs and provisions for the cutoff of federal funds in the event of noncompliance.

State Advisory Councils on Vocational Education. The failure of state advisory councils on vocational education to include representatives of private elementary and secondary schools was also criticized. Current regulations require only that the membership of the state advisory council include one or more individuals who "...represent, and are familiar with, nonprofit private schools...."[1] Several private school officials said that to meet this requirement, states often include a college professor who has conducted studies of proprietary (i.e., post-secondary) vocational schools. They urged that the regulations be modified to assure that private elementary and secondary schools are also represented. Another individual noted that local vocational education advisory councils are not required to include private school representatives and, as a result, private schools have little opportunity to participate in the formulation of school district plans and policies.

USOE Monitoring. The Office of Education was criticized for failing to properly oversee the formulation of state plans and carefully monitor their implementation. Several individuals noted that OE simply reviews state plans in a "checklist" manner to make sure the required language is included. Little investigation is done to make sure that the provisions of the state plan are carried out.

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[1] Code of Federal Regulations, Vol. 45, Public Welfare, Subchapter B, Part 104, Sec. 104-192.

Some private school officials suggested that the federal compliance and monitoring activities conducted under Title I of the Elementary and Secondary Education Act might be a useful model for the Vocational Education Act. Office of Education officials noted that they would like to do more monitoring of state and local activities, but lack the necessary financial resources and staff members.

Summary and Conclusions

There is a wide range of barriers that limit the participation of private school students in public vocational education programs. There is no way to determine which factor or barrier is the most troublesome, for not all the barriers noted here are present in every situation. Moreover, the precise formula that is used to determine what is a desirable level of cooperation varies from school district to school district. Nonetheless, it is clear that in the states and local school districts studied, private school students rarely participate in public vocational education to the degree envisioned by the Congress in the Vocational Education Amendments of 1976. In those few states where private school students are regularly served, the driving force is not federal requirements but a strong commitment on the part of the state to serve the needs of all students.

Clearly, part of the problem is attitudinal. Considering the traditional pejorative attitudes about vocational education, the private school emphasis on academics, and the traditional public/private antipathy, it is not surprising that private school students are not found in public vocational education programs.

These attitudes can indeed change. Vocational education is increasingly seen as salable education for a tight labor market. Private

schools, facing enrollment declines and cost pressures like their public counterparts, are growing more attuned to student needs and interests. Moreover, the traditional public/private attitudes of suspicion may not be as strong as they once were. Whether these changes and others in the future will lead to greater cooperation in vocational education is impossible to forecast.

Studies of successful cooperative programs have shown that effective communication between public and private schools is essential to cooperation. Absence of communication between these two groups, lack of knowledge of the existence and location of private schools, lack of clearly identified contact persons for either group, and the complexity of communication lines within the private sector are major barriers to effective communication.

In a time of runaway inflation, taxpayer revolts, and declining enrollments, financial barriers have become especially significant. As one state official put it, the problems now are more financial than philosophical. Since some public school officials are moved by financial problems to discourage student participation in costly vocational education programs, it seems clear that finances are increasingly interfering with the establishment of cooperative programs.

Finally, administrative and structural barriers created within state and local education agencies have been shown to interfere with the establishment of cooperative programs. It is very likely that action by Congress and/or the executive branch to reduce these structural and administrative barriers would help open the way to full implementation of the law.

CHAPTER V. COPING WITH THE BARRIERS

Introduction

In the previous chapter, the barriers to cooperative programs were classified under four major categories: attitudinal or philosophical, communicative, financial, and administrative and structural. For convenience, the discussion in this chapter about approaches that could be used for coping with the barriers has been organized under the same categories.

Clearly, the barriers described earlier are complex and cannot be removed entirely no matter how useful a particular approach may be. Our hypothesis is that certain steps can be taken, however, to reduce the effect of each type of barrier and raise the level of private student participation in vocational education.

It should also be noted that both the barriers and the recommended steps for coping with them are rooted in the larger pattern of public and private school relationships, so many of the recommended actions touch on public/private school cooperation in general.

Philosophical and Attitudinal Barriers

To some extent, the roots of the philosophical and attitudinal barriers to the participation of private school students in public school vocational education programs can be traced to some unresolved and, for the most part, unexamined questions underlying the structure of American education. The roles of the government and private enterprise in elementary and secondary education have been the subject of a great deal of polemic but very little serious study throughout the history of

American education. The current effort in California to establish a voucher plan, which would allow the state to support both public and private schools, has served only to add to the intensity of the polemic. Very little serious study has been undertaken.

Throughout a long period of disagreement, not only have basic issues gone unexplored, but in some cases even traditional definitions of the terms "public school" and "private school" no longer apply. At times, for example, the "public school" can behave as a "private" institution serving its own loyal public more than the general public. In one case that was encountered during this study, a private school student had to pay tuition for a public school vocational education program, while his brother, who attended the public school, enrolled in the program free of charge.

While it is important to recognize that certain basic issues have not yet been explored, it is also important to avoid linking participation in vocational education programs to the resolution of these philosophical or public-policy questions. A more pragmatic course of action is essential if the focus is to be shifted from the issues that separate the public and private schools to the concerns that they have in common. An historic example of this approach is the Elementary and Secondary School Act of 1965, which opened the door to public/private school cooperation by focusing attention, especially in Title I, on the disadvantaged student whose needs were to be met wherever he or she attended school. A similar approach for vocational education would be to focus attention on the employment training needs both of the locality and the students themselves and by involving staff and patrons of both public

and private schools with these concerns. With this approach, a workable basis for cooperation can be established. The structure for vocational education planning already includes advisory councils and the involvement of local business and industry. A more extensive involvement of people connected with both public and private schools in needs assessments and program planning and inclusion of private school representatives on local and state advisory boards would represent an important beginning for private school participation.

To accomplish this or any similar step toward greater private school participation, the private school community must exert itself in several ways. First, it must carefuly examine the needs of all of its students--not just those who identify themselves as college-bound students. The common assumption or myth is that all students attending private schools are college bound. While many are indeed headed for college, some students might be trapped in this stream by lack of information about realistic alternatives. Any significant participation by private school students in vocational education programs must begin with a thorough identification of the vocational education needs and interests of private school students and the stimulation of an active interest in vocational education on the basis of these needs. If private school staffs and patrons continue to assume that vocational education is not needed by any of their students, participation in publicly funded vocational education programs will be, as it often is now, a non-issue.

During the course of this project, one state official suggested that state vocational education departments begin an organized effort to increase private school participation through a statewide study of the

need for participation of private school students in publicly funded programs and the perceived barriers to participation. We believe this recommendation deserves serious attention. This official also recommended the preparation of a model study that each state could tailor to its own situation. Such studies would, indeed, generate useful information for planning purposes. They would also contribute to a better understanding in both the public and private school communities of the problems and possibilities for private school participation in vocational education programs.

Communication Barriers

Effective communication is also an essential requirement for cooperation between the public and private sectors. The crucial element in communications between the public and private schools is the designation of contact persons. Once public and private officials designate such individuals, effective communication and, very likely, cooperation can begin. The steps outlined in the Procedural Guide prepared as a part of this project emphasize the importance of designating contact persons in both the public and private sector. Cooperation is more likely to develop quickly, of course, if communication is already underway in other areas. Such situations, however, tend to be the exception rather than the rule.

Before communication can take place, steps must be taken to locate the private schools in each district. The Procedural Guide recommends specific steps that can be taken both at the state and local levels to assist in the identification of private schools. Lists of private schools for each public school district, which the National Center for

Education Statistics (NCES) plans to compile, can be used by states that do not publish their own complete lists of private schools along with the public school lists. The Guide suggests that state vocational education officials obtain state lists either from their state research branch or from the state coordinator for ESEA Title IV-C. According to the private school advisors to the project, the Title IV-C coordinator is the state official who, as a rule, has the most extensive list of private schools interested in participation in government-funded programs.

The dissemination of information about the availability of vocational education programs to private school staff, students, and parents is, of course, a vital first step that would precede needs assessment as well as the deliberations within the private school community referred to above. The literature on the promotion of innovative programs is replete with evidence that awareness of need results from awareness that particular programs are available. (This is why, for example, textbook companies are the effective agents of curricular change; they vigorously make known what is available.) Descriptions of available vocational education programs are an essential prerequisite to any private school participation. Several individuals interviewed for this study urged that state and local education agencies be required to conduct outreach programs to inform students, educators, and parents about the availability of cooperative programs.

Effective cooperation between public and private schools, usually involving principals and guidance counselors, can proceed from day to day without extensive involvement of higher level staff. It is important, however, that at the outset the appropriate boards and superintendents be

on record as favoring private school participation in publicly funded vocational education programs.

Financial Barriers

The current financial straits in public education, characterized by extremely scarce resources and local budget cutting, puts pressure on public school officials to take care of their own students first and other students later. The students who are considered last are, for the most part, private school students--even though they belong to the tax-paying public. Further, even a few communities have public school officials who are discouraging their own students from attending costly regional vocational education centers. In such cases, it would be naive to look for private school particiation in the programs.

Where cooperative public/private programs are functioning despite the financial difficulties of the times, finances become a barrier to full implementation of the kinds of programs that have been recommended. Nevertheless, the results of this study show that if attention is focused on the needs of all of the students and the labor market needs of the locality and if communication has been effectively established, financial problems remain significant but not insurmountable.

As noted in the previous chapter, federally mandated private school student participation is seldom funded solely by the federal government. In actual practice, the participation of private school students in vocational education programs is almost always carried out with some expenditure of state and, at times, local funds. In states in which there is an aversion or, at least, no commitment to providing vocational

education services to private school students, federal funds are simply shunted into other programs in which the participation of private school students is not mandated.

Further, private schools, dependent on tuition income as they are, have difficulty remitting tuition to students who choose to attend publicly funded institutions for part of the day. Some public school vocational education administrators see this unwillingness to refund tuition as a deterrent to private school student participation because the parents feel pressed to get their full money's worth. The extent to which this is a significant problem is difficult to assess. Many view it as an internal private school issue which will be resolved when and if the parents choose to make an issue of it.

Administrative and Structural Barriers

Even when the first three barriers--attitudinal, communication, and financial--can be dealt with, the fourth type--administrative and structural--often provides a ready excuse for the lack of private school participation in publicly funded programs. Nevertheless, even in states that have formidable legal and attitudinal barriers, examples of very successful provisions for the participation of private school students in vocational education programs have been found.

But serious problems seem to be created for the private school student when the vocational education program is offered by the local comprehensive high school rather than a regional vocational education school or center. Conducting programs in rival schools seems to produce more tensions than offering them in centers where virtually all of the students come from sending schools.

Disagreement as to attendance boundaries for private and public school students can, at times, present problems. But local negotiations can usually resolve these problems if all parties are indeed looking for solutions.

For the other administrative and structural barriers--poor planning, a lack of effective private school representation on the state and local advisory councils, and a lack of USOE monitoring--the remedies are fairly obvious. Poor planning can be remedied by a real commitment to participatory planning. Private school representation on advisory councils could be effectively promoted through a nomination procedure that involved contacts (at least by mail) with several private schools or private school organizations. (The Procedural Guide offers concrete suggestions for establishing contacts at the state level.) USOE monitoring could begin with a review of state plans in terms of their compliance with the various regulations and proceed from there to a formal inquiry in states that show no evidence of compliance.

Summary and Conclusions

All of the barriers to private school participation in vocational education programs discussed in this report are to some degree the result of apathy. In some cases, private school personnel are apathetic about the vocational educational needs of some of their students. In other cases, public school personnel are apathetic about the needs of students who are not seen as patrons of the public school system despite their tax-paying status. All of these barriers could be overcome if all educators shared a genuine concern for the needs of all students.

CHAPTER VI. FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

Introduction

Chapter VI is divided into two sections: a brief discussion of major findings and conclusions, and a listing of recommendations along with statements of the assumptions underlying the recommendations.

Findings and Conclusions

The findings of this project are that the development of cooperative relationships is impeded by a number of several barriers including:

- The lack at the federal, state, and local levels of accurate basic data on private schools and their students: Estimating the number of private school students who could benefit from vocational education (for use in program planning and implementation) is severely impeded by the lack of basic data. Accurate lists of private schools within states are frequently unavailable. At the local level, this problem contributes to the difficulty of locating students and assessing their needs.

- The absence of data on the extent and nature of private student participation in programs funded under the Vocational Education Amendments of 1976: Presently, states are not required to collect and report data on the number of private school students enrolled in federally supported vocational education programs. According to a National Center for Educational Statistics report, 2.8 percent of the

private schools in California, New York, Pennsylvania, Illinois, Ohio, Wisconsin, and New Jersey have their own vocational programs.[1] The grade levels of these programs, the number of students served, the occupational areas covered, and the extent to which these programs are operated in conjunction with public vocational education institutions is not known.

- Poorly developed communications networks among nonprofit private institutions and between private and public elementary and secondary institutions: Private education is aptly characterized as a loose-knit federation of institutions whose strength lies in the diversity of instruction offered the students. The plethora of affiliated and unaffiliated institutions, many of which strongly uphold their independent nature, contributes to the difficulty of communication within the private school sector. Furthermore, private institutions are often viewed as lying outside the mainstream of American education, and they are therefore excluded from the routine dissemination of educational materials. These problems, along with the traditional antipathy between public and private institutions, have in many instances effectively blocked communication at the local level.

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[1]Proctor and Nehrt, Nonpublic School Statistics, 1976-77, p. 8.

- Mistrust, misperceptions, negative stereotypes, and philosophical differences on the part of both private and public school officials about the roles of the two kinds of institutions in American society: A wide variety of attitudinal differences, typically based on a lack of knowledge about each other's institutions, have prevented the development of a common basis for mutual understanding. For example, many private school officials believe that vocational education is good for "somebody else's students." In the same vein, some public school administrators believe that private school students are exclusively college bound. Philosophical differences concerning such things as whether private education serves a public objective also contribute to misunderstanding and myths about private and public education.
- State prohibitions, policies, and regulations that discourage and restrict federal assistance to private school students: In many states, laws governing cooperation between public and private education block private school participation in vocational education programs. Among others, policies regarding attendance, dual enrollment, and district boundaries frequently lead to procedural complications that stifle cooperation. Furthermore, in some instances, state administrative practices are not consistent with local administrative practices.
- Transportation, scheduling, and other local administrative problems: The problems of institutions responsible for

transportation of private school students, conflicts between school calendars and class schedules, policies on grading and transfer of credit, student eligibility requirements, and excessive administrative costs have frequently been cited as obstacles that limit cooperation. These obstacles, however, frequently conceal deeply engrained communication and attitudinal problems that exist between the private and public sectors. When a basis for mutual understanding has been established between the public and private sectors, these and similar problems have been resolved to the mutual satisfaction of both groups.

- Confusing and conflicting interpretation of federal legislative provisions dealing with private school students: Interpretation and implementation of the provisions of the Vocational Education Amendments of 1976 that deal with the private school students vary greatly among states. Differing views about how frequently private schools should be contacted regarding their students' participation in vocational programs and about institutional responsibility for conducting students needs assessments, and different approaches to implementing Sec. 122 (f) of Public Law 94-482, which deals with the equitable access of private school students to vocational programs, were commonplace among states. For example, in only one of the nine states studied were data collected and used to ensure equity in providing private school students with access to programs of vocational education.

- The lack of clear administrative guidelines promulgated by the O.E.'s Bureau of Occupational and Adult Education to provide SEAs and LEAs with assistance in implementing cooperative arrangements between private and public institutions: Guidelines and policy statements based on the provisions of the Vocational Education Amendments of 1976 that deal with private students have not yet been prepared. The absence of such guidelines, together with general confusion regarding the legislative provisions, has contributed to the inequitable application of these provisions at the state and local levels.
- The general lack of interest of some private schools in accepting federal funds and a more specific lack of interest in vocational education programs: Some private schools are reluctant to accept federal funds for fear of governmental intervention in the operation of their institutions. Others are reluctant to participate simply because they are not informed about the benefits and opportunities of public vocational education programs. Fear of governmental intervention and lack of knowledge about the values of vocational education have combined to severely limit private students' participation in these programs.
- Lack of planning by state agencies responsible for providing private students with opportunities for vocational education: For the most part, state planning for private school students is nonexistent. As a rule, state plans for vocational education do not contain specific reference to

the involvement of private school students. Most often, only checklist kinds of assurances appear in these plans simply to meet federal requirements. Further compounding the situation is the fact that representatives of private schools are not routinely invited to help draw up vocational education plans.

- Lack of ties among national and state agencies to promote private student involvement in vocational education programs: Presently, the Bureau of Occupational and Adult Education has no formal ties with private school students through other federal bureaus, private school organizations, or state departments of education. Similarly, state departments of education seldom, if ever, function as a liasion between public and private schools on matters concerning vocational education.
- Relatively moderate degree of cooperation between regional vocational education centers and private high schools and virtually no cooperation between public and private high schools: Private high school faculties and patrons seem far more willing to send their students to regional centers than to send them to neighboring comprehensive public high schools. The inevitable competition for students between these two types of secondary schools seems to affect the willingness to cooperate on the part of both groups.
- Modest attempts have been made to provide nonprofit private school students with access to federally supported voca-

tional education programs in at least three states: New Jersey, Illinois, and Ohio have taken steps to ensure that private students are being served within the mainstream of public vocational education. The evidence shows that once the initial steps have been taken to examine the barriers, the participation of private school students in vocational education tends to increase over time. Yet the evidence also shows that initial steps do not solve all the problems.

- Personal contact at the school level is essential for developing a cooperative arrangement between the private and public education sectors: In all instances where ongoing cooperative arrangements have been established, personal contact between representatives of private and public institutions has been a precondition. Personal contact is probably the single most important ingredient for developing and implementing successful cooperative arrangements.
- There are some instances of public and private school cooperation in vocational education programs: While such cooperation in vocational education is more the exception than the rule, instances of effective cooperation have been found even in states which have historically been opposed to any kind of cooperation. In almost every instance, cooperation is a local phenomenon dependent almost entirely on local conditions.
- Interest in and openness toward increased public and private school cooperation in vocational education on the part of participants in the project-sponsored workshops: A

sustained high level of interest, positive comments, and vigorous discussion by workshop participants seemed to indicate that once the issue of private school access to publicly funded vocational education programs is raised state department personnel become interested in increasing the participation of private school students. It remains to be seen whether this interest and enthusiasm will be translated into constructive action.

Recommendations

The recommendations listed below are based upon the following assumptions:

- The provisions of the Vocational Education Amendments of 1976 that deal with private school students have been unevenly implemented within the states that were studied.
- Students in private schools have not been given equal opportunities for vocational education.
- Private school students have the same employment needs as their counterparts in the public schools.
- There is a lack of fiscal incentive for private and public school administrators to provide opportunities for private school students to participate in public vocational education programs. Moreover, national and state agencies are seldom, if ever, the initiators of cooperative arrangements.

The following is a list of recommendations for increasing the participation of nonprofit private school students in federally supported vocational education programs:

1. Provisions for the involvement of private school students in federally supported vocational education programs should be expanded to include all programs funded under the Vocational Education Amendments.
2. Joint planning by private and public school personnel should take place at all governmental levels.
3. Private school representatives should be included in local vocational education advisory groups. Furthermore, those selected to represent the private sector should be thoroughly familiar with private education at the elementary and secondary levels.
4. Private school representatives should be invited to participate in state and local workshops, seminars, and conferences dealing with vocational education.
5. Private school representatives should receive all materials on vocational education that are routinely distributed to public educators.
6. Model programs of cooperation between private and public institutions should be developed, and information about them should be widely disseminated.
7. State and local educational agencies should develop and implement outreach programs directed at the private education sector.

8. State plans for vocational education should include a section that describes state objectives, procedures, and other provisions for serving private school students.
9. State commissioners of education should allocate a portion of their discretionary funds for the development and implementation of innovative and exemplary programs of cooperation between private and public schools.
10. O.E.'s Bureau of Occupational and Adult Education should prepare and disseminate policy statements regarding the participation of private school students in public vocational education programs.
11. Federally directed monitoring of state agencies responsible for administering federal funds for vocational education should be strengthened to allow closer monitoring of service to private school students.
12. Data collected through the Vocational Education Data System that relates to private school students should be reviewed annually to determine the extent of participation of private students in public vocational education programs.
13. The rules and regulations governing federal assistance to private school students in all federally funded education programs--handicapped, bilingual, vocational, and so forth--should be reviewed and made as consistent as possible.
14. Special emphasis should be given to the evaluation of vocational programs involving private students.

15. Consideration should be given to the development of a fiscal incentive system (e.g., categorical aid or set-aside) to encourage public and private school administrators to initiate cooperative arrangements.

16. O.E.'s Bureau of Occupational and Adult Education and each state agency responsible for administering federal funds for vocational education should designate someone within their organization to be responsible for encouraging and initiating cooperative arrangements between private and public institutions.

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Vocational Education Act of 1963, as amended. 20 U.S.C.2305, 2307, 2332, 2350, 2370, 2330, 2352; P.L. 90-576.

APPENDIX A

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APPENDIX B

RULES AND REGULATIONS FOR VOCATIONAL EDUCATION LEGISLATION
THAT RELATE TO NONPROFIT PRIVATE SCHOOL STUDENTS

Citation	Legislation	Citation	Rules and Regulations
	COOPERATIVE VOCATIONAL EDUCATION PROGRAMS		COOPERATIVE VOCATIONAL EDUCATION PROGRAMS
20 USC 232	Sec. 122. Funds available to the States under section 120 may be used for establishing or expanding cooperative vocational education programs through local educational agencies with the participation of public and private employers. Such programs shall include provisions assuring that -- ...(f) to the extent consistent with the number of students enrolled in nonprofit private schools in the area to be served, whose educational needs are of the type which the program or project involved is to meet, provision has been made for the participation of such students; ...(g) Federal funds made available under this section to accommodate students in nonprofit private schools will not be commingled with State or local funds.	Sec. 104.532 Sec. 104.533	Assurances in five-year State plan. A State conducting cooperative vocational education programs under Sec. 104.531 shall provide assurances in the approved five-year State plan that: Students in nonprofit private schools. (a) A State using funds under its basic grant (Section 120 of the Act) for grants to local educational agencies for cooperative vocational education programs shall consult with the appropriate nonprofit private schools. (b) Each local educational agency receiving funds from the State for cooperative vocational education programs shall: (1) Identify the students enrolled in nonprofit private schools in the area served by the local educational agency whose educational needs are of the type which the cooperative vocational education programs and services may benefit; and (2) Assess adequately the needs of the students identified in subparagraph (1) of this paragraph for the cooperative vocational education programs and services being offered; and

APPENDIX B (cont.)

Citation	Legislation	Citation	Rules and Regulations
			(3) Provide the students identified in subparagraph (1) of this paragraph with the opportunity for cooperative vocational education programs and services in a manner which will most effectively meet the needs of these students. (c) The personnel, materials and equipment necessary to provide cooperative vocational education programs and services to nonprofit private school students shall remain under the administration, direction and control of the local educational agency. (d) Cooperative vocational education programs carried out by local educational agencies which include students enrolled in nonprofit private schools may be supported up to 100 percent with Federal funds. (e) Federal funds used to support cooperative vocational education programs which include students enrolled in nonprofit private schools will not be commingled with State or local funds so as to lose their identity. In developing policies and procedures, it shall not be necessary to require separate bank accounts for funds from Federal sources, so long as accounting methods will be established which assure that

APPENDIX B (cont.)

Citation	Legislation	Citation	Rules and Regulations
			expenditures of the funds can be separately identified. (Implements Sec. 122 (f); H. Rept. 1085, p. 46; 20 U.S.C. 2332.)
	EXEMPLARY AND INNOVATIVE PROGRAMS		EXEMPLARY AND INNOVATIVE PROGRAMS
20 USC 2352	Sec. 132. (a) Funds available to the States under section 130(a) may be used for contracts by State research coordinating units pursuant to comprehensive plans of program improvement for the support of exemplary and innovative programs.... (b) Every contract made by a State for the purpose of funding exemplary and innovative projects shall give priority to programs and projects designed to reduce sex stereotyping in vocational education and shall, to the extent consistent with the number of students enrolled in non-profit private schools in the area to be served whose educational needs are of the type which the program or project involved is to meet, provide for the participation of such students; and such contract shall also provide that the Federal funds made available under this section to accomodate students in nonprofit private schools will not be	Sec. 104.706	Use of funds for exemplary and innovative programs. (a) The research coordinating unit may use funds available under section 130 of the Act directly or by contract for... (b) (2) To the extent consistent with the number of students enrolled in private nonprofit schools in the area to be served, whose educational needs are of the type which the program is designed to meet, make provision (in accordance with the requirements set forth in Sec. 104.533) for the participation of these students in the programs, and also (3) Provide that the Federal funds made available for exemplary and innovative programs to accomodate students in nonprofit private schools will not be commingled with State or local funds. (Sec. 132(b); 20 U.S.C. 2352.)

APPENDIX B (cont.)

Citation	Legislation	Citation	Rules and Regulations
	commingled with State or local funds. (c) The annual program plan and accountability report covering the final year of financial support by the State for any such program or project shall indicate the proposed disposition of the program or project following the cessation of Federal support and the means by which successful or promising programs or projects will be continued and expanded within the state.		
	SPECIAL PROGRAMS FOR THE DISADVANTAGED		SPECIAL PROGRAMS FOR THE DISADVANTAGED
20 USC 2370	Sec. 140. (a) From the sums made available for grants under this subpart pursuant to sections 102 and 103, the Commissioner is authorized to make grants to States to assist them in conducting special programs for the disadvantaged [as defined in section 195(16)] in accordance with the requirements of this subpart. ...(2) Such funds may be granted to eligible recipients only if (A) to the extent consistent with the number of students enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which the program or project involved is to meet, provision has been made for the partici-	Sec. 104.803	Students in nonprofit private schools. A State may grant funds to eligible recipients only if: (a) Provision (in accordance with the requirements set forth in Sec. 104.553) has been made for the participation of students enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which the programs or projects involved is to meet, to the extent consistent with the number of such students; and (b) Effective policies and procedures have been adopted which assure that Federal funds made available under this subpart to accomodate students in nonprofit private schools will not be commingled

APPENDIX B (cont.)

Citation	Legislation	Citation	Rules and Regulations
	pation of such students, and (B) effective policies and procedures have been adopted which assure that Federal funds made available under this subpart to accommodate students in nonprofit private schools will not be commingled with State or local funds.		with State or local funds. (Sec. 140(b) (2); 20 U.S.C. 2370.)

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